

A.J. Eggenberger, Chairman
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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

625 Indiana Avenue, NW, Suite 700 Washington, D.C. 20004-2901
(202) 694-7000



March 18, 2009

Dr. Inés R. Triay
Acting Assistant Secretary for Environmental Management
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0113

Dear Dr. Triay:

The staff of the Defense Nuclear Facilities Safety Board (Board) recently performed a review of the maintenance program at the high-level waste (HLW) Tank Farms at the Savannah River Site (SRS). The review focused on the maintenance of selected safety equipment, as well as contractor and Department of Energy (DOE) oversight of the maintenance program. Overall, the staff found that safety-class and safety-significant systems and equipment in the HLW Tank Farms are being adequately maintained to perform their intended safety functions.

The enclosed report on maintenance in the HLW Tank Farms is provided for your information and use as appropriate. The Board would like to highlight two observations from this report:

DOE Order 433.1A, *Maintenance Management Program for DOE Nuclear Facilities*, requires that DOE review and approve a contractor's Maintenance Implementation Plan (MIP) every 2 years. The last DOE review letter approving the Tank Farms contractor's MIP was dated February 29, 2000. A new contractor assumed the Management and Operating contract at SRS in August 2008, and has responsibility for the site-wide MIP. This would be an ideal time for DOE to start implementing a 2-year review cycle of the MIP as required by DOE Order 433.1A.

The Tank Farms contractor has not compared the MIP with acceptable program elements contained in the *Nuclear Facility Maintenance Program Guide for Use with DOE O 433.1* (DOE Guide 433.1-1) to ensure that its approach provides an equivalent or better level of performance. Although compliance with the Guide is not a formal requirement, a comparison between the Guide and the contractor's MIP may identify areas of improvement for the maintenance program.

The Board notes that the Tank Farms MIP is derived from broader site-wide documents. The noted deficiencies likely extend to other site programs. Furthermore, in a letter to the

Assistant Secretary for Environmental Management dated September 17, 2008, the Board noted similar deficiencies at the Hanford Tank Farms. The Board urges you to assess the extent to which these deficiencies exist at other sites under your cognizance.

Sincerely,

A handwritten signature in black ink, appearing to read "A. J. Eggenberger". The signature is fluid and cursive, with the first name "A. J." written in a more compact, stylized manner.

A. J. Eggenberger
Chairman

Enclosure

c: Mr. Jeffery M. Allison
Mr. Mark B. Whitaker, Jr.